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PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re: § Chapter 11  
ERG Intermediate Holdings, LLC, *et al.*,<sup>1</sup> § Jointly Administered  
Debtors. § Case No.: 15-31858-hdh-11

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**NOTICE OF HEARINGS**

**PLEASE TAKE NOTICE** that, on May 11, 2015, the above-captioned debtors (the "Debtors") filed the Motion of the Debtors for an Order (I) Establishing Bar Dates for Filing Proofs of Claim and (II) Approving Form and Manner of Notice Thereof [Docket No. 77] (the "Bar Date Motion") in connection with these chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE** that, on May 11, 2015, the Debtors filed the Debtors' Motion for Entry of an Order (I) Authorizing the Retention and Employment of AP Services, LLC and (II) Designating Rebecca A. Roof as Chief Restructuring Officer *Nunc Pro*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

*Tunc* to April 30, 2015 [Docket No. 79] (the "AP Services Application") in connection with these chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE**, that a hearing to consider the entry of the relief requested in the Bar Date Motion and the AP Services Application will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on **June 1, 2015 at 1:30 p.m. (CDT)**, or at such other time as the court may determine.

**PLEASE TAKE FURTHER NOTICE** that any objections or other responses to the Bar Date Motion or the AP Services Application (collectively, "Objections") must be filed on or before **May 25, 2015** (the "Objection Deadline") with the Clerk of the Bankruptcy Court for the Northern District of Texas (the "Clerk's Office"), Earle Cabell Federal Building, 1100 Commerce St., Rm. 1254, Dallas, TX 75242-1496. At the same time, you must serve a copy of the Objection upon the most current Service List filed with the court pursuant to the Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 61]. Objections must be so served so as to be actually received by the parties on the Service List by the Objection Deadline.

Dated: May 11, 2015  
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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